

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Petition for Waiver of Rules Requiring Support)	GN Docket No. 15-178
of TTY Technology)	
)	

THIRD REPORT

On December 29, 2017, the Federal Communications Commission (“FCC” or “Commission”) granted TracFone Wireless, Inc. (“TracFone”) an extended waiver of its requirements to support text telephony (“TTY”) over Internet-Protocol (“IP”)-based wireless services until June 30, 2021.¹ As a condition of the grant, TracFone is required to file a report with the Commission every six months describing its progress toward implementing real-time text (“RTT”).² Specifically, the Commission has asked that TracFone “indicate the extent to which RTT solutions are available from its underlying carriers, in addition to providing information on its own progress toward implementing RTT solutions.”³ TracFone’s first progress report is below.

As the Commission has noted, TracFone is a mobile virtual network operator (“MVNO”) that resells “commercial mobile radio service (CMRS) obtained through agreement[s] with various licensed operators of wireless networks throughout the United States.”⁴ MVNOs are in

¹ *TracFone Wireless, Inc., Petition for Extension of Waiver of Rules Requiring Support of TTY Technology*, Order, 32 FCC Rcd 10470 (2017) (“*TracFone Waiver Order*”).

² *TracFone Waiver Order*, ¶ 9.

³ *TracFone Waiver Order*, ¶ 9 n. 31.

⁴ *TracFone Waiver Order*, ¶ 4.

the unique position of being entirely dependent on the solutions implemented by their underlying facilities-based carriers.

The Commission requires that, when implemented, RTT solutions must be interoperable, backward compatible with TTY technology, and capable of supporting certain basic features and capabilities available to users.⁵ After consulting with our underlying carriers, we are able to report that they continue to make progress in implementing industry standard RTT solutions to meet the Commission's requirements.⁶

Two of TracFone's underlying carriers continue implementing device-based RTT functionalities and have no new updates. Another carrier, which offers RTT capability through a native dialer and a mobile app, has required that all new smartphones must support RTT. That carrier reported that the RTT app has been removed from the Google Play store as of May 15, 2019.⁷ However, the carrier reports that only two subscribers had downloaded the RTT app in the last 30 days, and there was one uninstall during the same period. The carrier plans to discontinue support of the app and offer only the native dialer solution for RTT. Because all new smartphones entering the laboratory for certification must support RTT, the mobile app solution has become less necessary.

Our underlying carriers report that interoperability has not presented any challenges and there have been no obstacles to achieving the required backward compatibility.

⁵ *Transition from TTY to Real-Time Text Technology; Petition for Rulemaking to Update the Commission's Rules for Access to Support the Transition from TTY to Real-Time Text Technology, and Petition for Waiver of Rules Requiring Support of TTY Technology*, Report and Order and Further Notice of Proposed Rulemaking, 31 FCC Rcd 13568, ¶ 26 (2016).

⁶ AT&T Services, Inc., Verizon, and T-Mobile USA, Inc., which are the underlying carriers serving 99% of TracFone's customers, provided the information presented in this report.

⁷ The iOS RTT app is not impacted.

Finally, our underlying carriers report that they have not encountered any challenges in transmitting emergency information to the correct public safety answering points.

Although the Commission granted TracFone an extended waiver until June 30, 2021 of the Commission's requirements to support TTY technology over IP-based wireless services, TracFone is already requiring its manufacturers to work with its underlying carriers to include the embedded solution in its devices. Furthermore, TracFone has provided its Customer Care resources to enable it to support to its customers with regard to RTT compatibility.

TracFone will continue to monitor the progress being made by its underlying carriers in their various stages of testing.

Respectfully submitted,

TRACFONE WIRELESS, INC.

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